



SELMER WORK PLAN COMMENTS

1. Sampling Activities

- identify the procedures and equipment that will be used for the soil gas, soils and groundwater sampling.
- include your QA-QC procedures including: blanks, duplicates, chain-of-custody, laboratory methods, name of laboratory etc.
- specify decontamination procedures.
- define the frequency and duration of sampling for each of the matrices described above.
- include site map of sampling locations.
- discuss method for head-space analysis if it is going to be used as a screening tool.

2. Soil Gas Analysis

- 100 ft. grid only appropriate for site screening; in areas of known or suspected contamination a closer spaced grid will be required.
- identify the parameters that will be analyzed for.
- what method of SGA will be used.

3. Health and Safety Plan

- identify the H&S Officer and list his responsibilities
- identify other project personnel and their responsibilities.
- develop a risk analysis for each task.
- discuss the use of the various "levels of protection" and other relevant safety equipment.

4. Installation of Monitor Wells

- will split spoon samples be taken and the analytical results used as a guide to set the screened interval?
- identify the drilling method.
- provide the technical specifications rather than just stating they will be used.
- how many, what kinds, single or nested, etc, etc. need to be addressed.
- define elevated levels as used on p.7
- surface water samples not required by US EPA.
- discuss the frequency of sampling
- US EPA will require a certain number of "splits"

5. General

- provide a project schedule
- a pre-work meeting

WORK PLAN COMMENTS

I have enclosed a copy of a generic work plan that should give the consultant some starting point. It is not set in concrete. Items that do not apply or are not practicable for this site can be changed or modified.

First of all, I prefer to deal strictly with the environmental firm making the statement of work (SOW). To have to explain every point to a lawyer first before I can discuss it with the technical person, is a waste of several persons time, mine first and foremost!

I do not plan to write the SOW for the PRP's; but I am willing to review their proposals; as many times as it takes. I am also willing to do this in a very timely manner. They will not be waiting on me.

This particular SOW meets very few of the necessary criteria, in fact I would actually call it a proposal or an outline of work to be performed in the future. The following are a few of the items that will have to met before US EPA approval will be granted; they include:

◊ SOIL GAS ANALYSIS

This method will only be used to delineate "anomalies" that will need to be further investigated by soil sampling. What type of soil gas is proposed? Petrex sampling or the "slam-bar" method? SGA will not replace the need to take soil samples by using split-spoons and the following chemical analysis in areas of high probability or in those as indicated by SGA. 100 ft. spacing is not adequate for all areas of the property.

◊ MONITOR WELLS

CERCLA does not require the PRP's to obtain permits, only to meet the requirements of such permits. A site H&S plan will be required on this activity along with on every other activity. 8 monitor wells appears to be adequate to determine the direction of ground water flow, in fact it's probably too many. Are the soil samples to be screened using "head space analysis"? If elevated, why not analyze them? The PRP's need to describe in detail the QAQC procedures used to handle samples and decontamination procedures. US EPA will be present while this activity is on-going and will require designated "splits". All wells will be drilled to the depth required to fully penetrate the shallow aquifer; cannot merely pick a depth of 40 ft, every well

might be different. What is the frequency of ground water measurements? Just a "one-shot " deal or over the course of months? Additional groundwater samples will be required from the swampy area or other areas as delineated from soil borings. The contractor should consider the use of the "Hydro-punch" for this activity.

I believe the "outline" from the PRP's can be molded into a workable SOW, however SGA alone along with monitor wells will not be sufficient to conclude that a "point source" of VOC contamination is not present on site without a yet to be determined number of soil samples. The PRP's also need to be aware of the fact that if their work leads us to following a "point source" off site, they will be obligated to do their delineation to that extent.